

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE: § § CASE NO. 21-51523-mmp  
deeproot Capital Management, LLC, § § Chapter 7  
DEBTOR. § §

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned attorneys of THE LAW OFFICES OF RAY BATTAGLIA, PLLC, appearing on behalf of CCW BRAUN HEIGHTS, LLC a Texas limited liability company (“Company”), (ii) CONRAD CAR WASH, INC., a Utah Corporation (“Manager Member”), (iii) THE CLIF AND SUSAN CONRAD TRUST, request service of all notices and papers herein upon the address listed below, pursuant to section 1109 of Title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, and rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure.

Ray Battaglia  
Law Offices of Ray Battaglia, PLLC  
66 Granburg Circle  
San Antonio, TX 78218  
(210)601-9405  
[rbattaglialaw@outlook.com](mailto:rbattaglialaw@outlook.com)

PLEASE TAKE FURTHER NOTICE that the foregoing request includes all pleadings of any kind, including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property, or its estate. The undersigned requests that its name be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Request for Service of Papers* (the “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge; (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any

purpose other than with respect to this Notice; (v) an election of remedy; and (vi) any other rights, claims, actions, defenses, setoffs, and recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: January 21, 2022

By: /s/ Ray Battaglia

Raymond W. Battaglia

Texas Bar No. 01918055

Law Offices of Ray Battaglia, PLLC

66 Granburg Circle San

Antonio, Texas 78218

Tel.: (210) 601-9405

Fax: (210) 855-0126

[rbattaglia@outlook.com](mailto:rbattaglia@outlook.com)

***Counsel to CCW BRAUN HEIGHTS, LLC, CONRAD  
CAR WASH, INC and THE CLIF AND SUSAN  
CONRAD TRUST***

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system, as set forth below. I further certify that it has been transmitted by first class mail to the following parties on January 21, 2022:

Catherine A. Curtis

Wick Phillips Gould & Martin, LLP  
3131 McKinney Ave, Suite 500  
Dallas, TX 75204  
(214) 692-6200  
Email: [catherine.curtis@wickphillips.com](mailto:catherine.curtis@wickphillips.com)

Jason M. Rudd

Wick Phillips Gould & Martin LLP  
3131 McKinney Ave, Suite 500  
Dallas, TX 75204  
(214) 692-6200  
Email: [jason.rudd@wickphillips.com](mailto:jason.rudd@wickphillips.com)

John Patrick Lowe

2402 East Main Street  
Uvalde, TX 78801

Pulman Cappuccio & Pullen LLP

2161 NW Military Hwy, Suite 400  
San Antonio, TX 78213  
Email: [rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)

/s/ Raymond W. Battaglia

Raymond W. Battaglia